

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Northeast Regional Office
Highway 63 North
1307 Jackson
Macon, MO 63552
Ph. 816-385-2129
FAX 816-385-6398

CERTIFIED
P 036010674

3.800 Macon
L.O.W. #92-NE.004

March 2, 1992

Mr. Scott Warren, President
Perfect Plating Company, Inc.
2000 Hyde Drive
Macon, MO 63552-9782

Dear Mr. Warren:

Enclosed is a copy of the Resource and Recovery Act and Missouri Hazardous Waste Management Law Compliance Evaluation Inspection Report concerning the February 10, 1992 inspection of Perfect Plating Company, Inc. I believe the report is self-explanatory.

Due to the unsatisfactory features observed, Notice of Violation Number 1085 was issued during the closing conference. Also enclosed is another copy of that document.

On February 25, 1992, the Northeast Regional Office received your response to the Notice of Violation. The response adequately addressed several of the issues. However, in order to demonstrate compliance with all the unsatisfactory features discussed in the report, additional information must be submitted. The following list summarizes information that must be submitted as related to each unsatisfactory feature in the report. (These numbers relate to the unsatisfactory features numbered in the report.)

1. (Adequately addressed.)
2. Please explain what action has been taken to assure that in the future all hazardous waste containers in storage will be kept properly closed.
3. Please provide a statement certifying that all hazardous waste containers will be properly labeled in the future. Also, provide a description of how the "disputed unlabeled containers were eliminated."
4. (Waste oil adequately addressed.)

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

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HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

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RCRA RECORDS

Mr. Scott Warren, President
Perfect Plating Company, Inc.
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5. (Satellite accumulation container open.) Please explain what action has been taken to assure that in the future all hazardous waste satellite accumulation containers will be kept properly closed.
6. Please report what emergency information has been posted next to the phone.
7. (Land disposal restriction notification - adequately addressed.)
8. Please submit a copy of letters making arrangements with local emergency agencies.
9. (Waste oil registration - adequately addressed.)
10. Please submit a copy of contingency plan, personnel training program, and other documentation showing compliance with large quantity generator requirements; or, explain changes in the operation which will maintain less than 1000 kg of hazardous waste generated per month or accumulated and provide a statement certifying that Perfect Plating Company, Inc. will not generate 1000 kg of hazardous waste per month or accumulate that amount.

The above information must be submitted in writing to the Northeast Regional Office by March 16, 1992. A copy should also be sent to Bruce Martin, Hazardous Waste Program Enforcement Unit, P. O. Box 176, Jefferson City, MO 65102.

If you have any questions, please contact Sam Wilson in our Northeast Regional Office.

Sincerely,



Charles S. Decker, P.E.
Regional Director

CSD/SW/tdr

cc: ~~Hazardous Waste Management Program~~

Enc.

RESOURCE CONSERVATION RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility:

Perfect Plating Company, Inc.
2000 Hyde Drive
Macon, MO 63552
816-385-3626

EPA ID #: MOD985799238
Mo. Generator ID: 014998

Participants:

Perfect Plating Company, Inc.

Department of Natural Resources

Mr. Scott Warren, President

Mr. Edward Galbraith
Environmental Specialist
Hazardous Waste Management Program

Mr. Sam Wilson
Environmental Specialist
Northeast Regional Office

Introduction:

A compliance evaluation inspection was conducted of the hazardous waste management activities of the Perfect Plating Company, Inc. facility located at Macon, Missouri on February 10, 1992. The evaluation was to determine compliance with the Missouri Hazardous Waste Management Law and Regulations and the Federal Resource Conservation and Recovery Act and Regulations. The inspection was conducted under authority of Sections 260.375(9) and 260.377 RSMo.

Due to the unsatisfactory features observed, Notice of Violation #1085 was issued to Mr. Warren at the conclusion of the inspection.

Facility Description:

Perfect Plating Company, Inc. is a metal finishing facility that began operations in Macon, Missouri in April, 1991. The facility employs three people and registered as a small quantity generator of hazardous waste in July, 1991.

The main operation of the facility is presently zinc and cadmium electroplating of steel. Steel parts are first cleaned by dipping them in a caustic cleaner in the cleaning line. Any oil coating is removed from the part and is skimmed off into a bucket. The steel parts are then immersed in a series of vats in one of the electroplating lines. Although presently only cadmium and zinc electroplating are conducted, Mr. Warren reported that he intends to later begin chrome and nickel plating lines. After being plated, the parts are

dipped in an appropriate aqueous chemical solution which gives an olive drab, yellow chromate or clear conversion coating to the part. Hazardous waste streams generated from this operation include waste oil (D098), waste caustic cleaner, and electroplating wastewaters. The waste oil is generated at a rate of approximately 55 gallons per year and will be managed by Safety-Kleen Corporation. The caustic cleaner (D002) is normally transferred from the cleaning line to an on-site wastewater pretreatment facility prior to being discharged to city sewers. However, at the time of inspection, more than seven 55 gallon drums of this material was being stored prior to being introduced into the pretreatment facility. Mr. Warren explained that it was stored because he had not had time to transfer it into the wastewater tank. Due to the amount being stored, Perfect Plating is subject to large quantity generator requirements.

Rinse waters from the plating lines are also introduced into the pretreatment facility along with the spent alkaline cleaners and spent acids. In the wastewater facility, the pH is reduced to 2.5-3.5 by using spent acids. Sodium bisulfide is then added to change any hexavalent chromium to trivalent. The pH is then raised to 8.5-9.0 by adding lime. A polymer is then added to form a flocculate to help precipitate out the heavy metals. After the floc settles it is dewatered in a filter press and dried in an oven. The resulting wastewater treatment sludges from the electroplating operation (F006) is stored in 55 gallon drums as a hazardous waste. This waste is being generated at a rate of approximately 96 kg per month. Approximately 1 1/2 drums of the F006 waste is stored on site and none has been shipped off yet.

In the stainless steel passivating line caustic cleaners and waste acids are generated. These wastes are treated in the wastewater pretreatment facility.

Waste petroleum zaptha (D001, D018, D039) is generated at a rate of 86 pounds every six weeks. The waste is generated from a shop parts cleaner and the waste is managed by Safety-Kleen Corporation (MOD980971626,HH-0020) under a contractual agreement.

Unsatisfactory Features:

1. The generator has failed to submit accurate waste stream information or to update waste stream information. 10 CSR 25-5.262(2)(A) Perfect Plating registered the waste streams F006 And D001 in July, 1991. However, waste streams currently being generated include not only F006 and D001 but also D018, D039. Any time that the generator information changes, the revised information must be submitted to the Department. A revised registration form must be submitted to the Hazardous Waste Management Program.
2. Several containers of hazardous waste were not closed. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a). One 55 gallon metal drum containing Hazardous Waste Solids N.O.S. (wastewater pretreatment filtercake) in storage had an

unsecured lid on it. In order to be considered a closed container, the lid must be secured with a locking ring so that the waste would not spill if the container were tipped over. Two large open-topped plastic drums and two buckets containing spent caustic cleaners stored prior to being introduced into the wastewater pretreatment facility did not have lids. All containers of hazardous waste in storage must be kept closed except when adding or removing waste.

3. Containers of hazardous waste in storage were not properly labeled. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3). Seven 55 gallon drums and two open-top plastic drums of hazardous waste stored prior to being introduced into the wastewater pretreatment facility were not labeled as hazardous waste and did not contain a start storage date. All containers of hazardous waste being stored must be properly labeled.
4. One 55 gallon drum and one five gallon bucket containing waste oil were not properly labeled and the bucket was not closed. 10 CSR 25-11.010(3)(C). All containers of waste oil must be kept closed and all waste oil containers with a capacity of five gallons or more must be labeled with the words "Waste Oil". The label must be at least 1 1/2 inches in height and proportional in width.
5. The container of Hazardous Waste Solids N.O.S. (wastewater pretreatment filtercake) in satellite accumulation was not properly closed. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a). The satellite accumulation drum did not have the lid secured. Each hazardous waste satellite accumulation container must be kept closed except when adding or removing waste.
6. The generator has failed to post required emergency information next to the telephone. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii). Certain information must be posted next to the telephone for use during a hazardous waste emergency. This information includes the emergency coordinator's name and telephone number, the telephone number of the fire department, and the location of fire extinguishers and spill control equipment. All employees should be aware of the location of this information.
7. The generator has not provided a land disposal restriction notification to the receiving facility or has not retained a copy on file. 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a). The waste petroleum naptha has been shipped off-site under a contractual agreement with Safety-Kleen Corporation but Mr. Warren did not have a copy of a land disposal restriction notification that should have been provided to Safety-Kleen with the initial shipment. A notification for this waste stream must be provided to Safety-Kleen and a copy must be kept on file by the generator. A land ban notification must also accompany each manifested shipment of hazardous waste that is shipped off site in the future.

8. The generator has failed to attempt to make arrangements with local emergency agencies. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37. The generator must attempt to make arrangements with local emergency agencies such as fire department, police department, local hospital, and ambulance service to familiarize them with the layout of the facility, properties of hazardous wastes handled, and associated hazardous and possible evaluation routes. It is recommended that a copy of those attempts be kept on file.
9. The generator has failed to register as a waste oil generator. 10 CSR 25-11.010(4)(A) Any person who generates in one month or ever accumulates at one time, 100 kg of waste oil (D098) must register as a waste oil generator. This waste stream can be registered by including it on the revised generator registration form discussed under #1.
10. The generator has more than 1000 kg of hazardous waste stored on site but does not meet the requirements for large quantity generators. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a). At the time of inspection, at least seven 55 gallon drums of caustic waste from the metal cleaning line were being stored prior to being introduced into the wastewater pretreatment facility. Due to the storage of this waste instead of transferring it to the pretreatment facility immediately upon generation, Perfect Plating has more than 1000 kg of hazardous waste in storage. Therefore, Perfect Plating is subject to large quantity generator requirements including the requirements for a contingency plan and personnel training plan. Mr. Warren indicated that he does not wish to be a large quantity generator. It is recommended that Perfect Plating meet all large quantity generator requirements including contingency plan and personnel training plan; or, that Perfect Plating change procedures such that the hazardous waste from the cleaning and plating lines are introduced into the wastewater pretreatment facility immediately upon generation and certify in writing to the Department that Perfect Plating will neither generate in one month or accumulate at any time 1000 kg of hazardous waste.

SUBMITTED BY:



Sam Wilson
Environmental Specialist IV

SW/tdr


**NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS**

FACILITY NAME <u>Perfect Plating Co., Inc</u>			
ADDRESS <u>2000 Hyde Drive</u>		CITY <u>MACON</u>	STATE <u>MO</u>
MISSOURI ID NUMBER <u>014998</u>		DATE OF INSPECTION <u>2/10/92</u>	
During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.			

CITATION	DESCRIPTION OF VIOLATION
260.380(1)	
10CSR25-5.262(2)(A)	1. Failure to register waste streams properly
10CSR25-5.262(1); 40CFR262.34(d)(2); 40CFR265.173(a);	2. Failure to keep containers of haz. waste closed.
10CSR25-5.262(1); 40CFR262.34(d)(4); 40CFR262.34(2)(3); 10CSR25-5.262(1)	3. Containers of hazardous waste not labeled
10CSR25-5.262(1); 40CFR262.34(d)(5)(ii)	4. Emergency information not posted next to phone
10CSR25-11.010(3)(c)	5. Waste oil containers not labeled & closed.
10CSR25-11.010(4)(A)	6. Failure to register as a waste oil generator
10CSR25-5.262(1); 40CFR262.34(d)(4); 40CFR265.37	7. Failure to make arrangements with local emergency agencies
10CSR25-5.262(1); 40CFR262.34(a)	8. Failure to meet large quantity generator requirements
10CSR25-7.268(1); 40CFR262.7(a)	9. Failure to provide Land Ban Notification with hazardous waste & failure to keep copy on file

This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Waste Management Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Administrator, Northeast Regional Office.

The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this notice or wish to discuss your response, you may call Sam Wilson at 816-385-2129 or BRUCE MARTIN at 314-781-3176.

Signature of Preparer Sam Wilson Date 2/10/92

The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.

SIGNATURE <u>Scott Warren</u>	PRINTED NAME <u>Scott WARREN</u>
TITLE <u>President</u>	DATE <u>02/10/92</u>



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

SGQ-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME Perfect Plating Co Inc		DATE 2/10/92	EPA I.D. NUMBER MO D985799238
ADDRESS 2000 Hyde Drive		RR NO	MO I.D. NUMBER 014998
CITY macon	NUMBER OF EMPLOYEES 3	YEARS AT SITE <1 yr (4/91)	TELEPHONE NUMBER 816-385-3626

FACILITY REPRESENTATIVE(S), TITLE(S)

Scott WARREN, President

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

This is a metal finishing facility. Operations include zinc and cadmium electroplating on steel, passivating stainless steel, mechanical glass bead blasting of steel & stainless steel and a buffing, grinding and polishing operation. The electroplating is followed by applying a conversion coating (olive drab, yellow chromate, or clear) by dipping in an aqueous chemical coating solution. Stainless steel is passivated (made corrosion resistant) by treating the steel in Nitric acid and sodium dichromate bath. The glass bead blasting is conducted to remove scale from the unpainted metal.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
Waste Petroleum Naptha 1. generated from parts cleaner from maintenance work in shop area & heavy degreasing operations	39 Kg/mo.	D001 D018 D039	Safely Kleen
Hazardous Waste Solid, NOS. 2. Filtercake from wastewater pretreatment facility for an electroplating operation.	96 Kg/mo	F006	NONE shipped yet.
Waste Oil - generated by skimming oil 3. from caustic cleaners.	55 gallon / yr.	D098	Safely Kleen
Caustic solution from cleaning line 4.		D002 D002	Wastewater Pretreatment facility
5.			

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

1. ☐ Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)
2. ☒ Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11
3. ☒ Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo
4. ☐ Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo
5. ☐ Facility does not operate as a TSD - Section 260.390(1) RSMo

COMMENTS

1. Need to update registration.

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. ☒ Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)
2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172
4. ☐ Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)
5. ☒ Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)
6. ☒ Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.
7. ☒ Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.
8. ☒ Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)
9. ☒ Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)
10. ☐ Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)
11. ☒ Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)
12. ☒ Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)
13. ☒ Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35
14. ☒ Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33 N/A
15. ☒ "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)
16. ☐ Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)

COMMENTS

↑ Containers open

10. Only 3 containers marked
7-55 gallon drums & 2 open top drums
were not marked

16. Not labeled

C. SATELLITE ACCUMULATION

1. ☐ Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(I) referencing 40 CFR 265.173
2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(I) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(I) referencing 40 CFR 265.172
4. ☒ Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)
5. ☒ Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.
6. ☒ Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.

COMMENTS

1. Container of Foog not closed

7. ☒ Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.

COMMENTS

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☒ Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31

COMMENTS

2. ☒ Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (2)(C)2.E.

Extinguishers - uses shop vac & make-shift berms

3. ☒ Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)

4. ☒ Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33

5. ☐ Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)

SCOTT WARREN

6. ☐ Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)

Not posted next to phone

7. ☐ Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)

8. ☒ Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)

9. ☒ Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)

10. ☒ Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				

1. ☐ Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)

COMMENTS

2. ☐ Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)

3. ☐ Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)

4. ☐ Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)

5. ☐ Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)

6. ☐ Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)

7. ☐ Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(i)

8. ☐ Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)

9. ☐ Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)

N/A

10. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	} N/A	COMMENTS
11. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)		

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	<p>COMMENTS</p> <p>No manifests - get shipments</p> <p>No manifested off site</p> <p>17. No copy on file. Mr. Warren was not aware if an initial LDR had been sent to Safety-Kleen</p>	COMMENTS
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)		
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)		
4. <input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)		
5. <input type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A		
6. <input type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.		
7. <input type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s - 10 CSR 25-5.262(2)(B)2.		
8. <input type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.		
9. <input type="checkbox"/> Alternate designated facility or instructions to return waste - 10 CSR 25-5.262(2)(B)1.		
10. <input type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.		
11. <input type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.		
12. <input type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.		
13. <input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A		
14. <input type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1		
15. <input type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C		
16. <input type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1		
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)		
18. <input type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)		

G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	1. Not Made.	COMMENTS
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)		

H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	<p>COMMENTS</p> <p>Not registered</p> <p>N/A - None shipped yet</p>	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.		
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(4)(A)		
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(A)		

I. RESOURCE RECOVERY

☒ RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)

COMMENTS

2. ☐ Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)

3. ☐ Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.

4. ☐ Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)4.

5. ☐ Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)3.

N/A

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS

GENERATOR has more than 1000 kg hazardous waste on site but does not meet LQG requirements. The waste from the cleaning line which is stored prior to being introduced into the wastewater pretreatment facility causes Perfect Plating to be subject to LQG requirements. Mr. Warren stated he would change operations so as not to store the cleaning line waste prior to wastewater treatment, so as not to be subject to LQG requirements.

INSPECTOR'S SIGNATURE

Sam Wilson

DATE

2/10/92

PERFECT PLATING COMPANY, INC.

2000 HYDE DRIVE MACON, MISSOURI 63552-9782 (816) 865-2656 Northeast Regional Office

Date Received

FEB 25 '92

02/25/92

Chief, Enforcement Section
Waste Management Program
Dept. Natural Resources
PO Box 176
Jefferson City, MO 65102

ADMU _____
APCU _____
PDWU _____
WMU _____
WPCU _____
Copies to: _____

Dear Sir/Madame:

The following corrective actions have been taken in response to an inspection at this facility 02/10/92.
(See N.O.V. # 1085)

- Item # 1. Waste stream registration forms have been sent this date and delivered to the regional office.
- Item # 2. Containers were more securely closed.
- Item # 3. Disputed unlabeled containers were eliminated.
- Item # 4. Emergency numbers entered at each phone.
- Item # 5. Waste oil containers have been labeled and will be promptly placed into separator to eliminate need for closing five gallon buckets.
- Item # 6. Waste oil registration form completed and mailed/delivered this date.
- Item # 7. Arrangements with fire department made 01/14/1992. Police and Hospital/ambulance to be made by 02/28/92.
- Item # 8. NO Longer applicable as disputed drum contents were placed into flow through process tank.
- Item # 9. Completed and mailed this date.

If there are any questions or comments please call or write.

Sincerely,


Scott Warren, President

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

SAFETY-KLEEN CORP.
(DESIGNATED FACILITY)

EPA ID NO. MOD980971625

(DESIGNATED FACILITY)

ESS: 2400 Big Bear Ct. Columbia, Mo 65202

SECTION A

Under manifest number _____, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

SECTION B

CUSTOMERS ONLY
WASHER AND
IMMERSION CLEANER
609 AND 699

I am a small quantity generator (100-1,000 kg/mo) in accordance with 40 CFR 268.7. This notice applies to all waste shipments under my service contract with Safety-Kleen Corp. It covers today's shipment on manifest No. 485501, or sales / service acknowledgement No. 485501, and all subsequent shipments. A copy of this notice will be maintained with the service contract(s) or sales/service acknowledgement(s) for five (5) years beyond the termination of the service contract.

WASTE NAME	EPA WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l) OR METHOD (FOR NON-WASTE WATER)
<input checked="" type="checkbox"/> Waste Petroleum Naphtha	D001	Ignitable Liquid (High TOC Subcategory) Halogenated Organic Compounds (HOC's) ≥ 1000 mg/l	Incineration (INCIN), fuel substitution (FSUBS) or recovery (RORGS) INCIN
<input type="checkbox"/> Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D007, D008,	All of the above, plus: —Cadmium —Chromium —Lead	1.0 5.0 5.0
<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion Cleaner 609	F002, F004, D006, D007, D008,	Cresylic Acid 1, 2-dichlorobenzene Methylene Chloride —Cadmium —Chromium —Lead	0.75 0.125 0.96 1.0 5.0 5.0
<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion Cleaner 699	D006, D007, D008,	HOC's ≥ 1000 mg/l —Cadmium —Chromium —Lead	INCIN 1.0 5.0 5.0
<input type="checkbox"/> Waste Perchloroethylene	F002	Tetrachloroethylene	0.05
<input type="checkbox"/> Waste Trichlorotrifluoroethane	F002	Trichlorotrifluoroethane	0.96
<input type="checkbox"/> Waste 1,1,1 Trichloroethane	F002	1,1,1 Trichloroethane	0.41
<input type="checkbox"/> Waste Paint Related Material	F005, F003, D006, D007, D008, D001,	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene Methanol Cadmium Chromium Lead Ignitable Liquid (High TOC Subcategory)	0.59 0.75 0.33 0.33 0.15 0.75 1.0 5.0 5.0 INCIN, FSUBS, or RORGS
<input type="checkbox"/> Waste Antifreeze	D008	Lead	5.0 (This is a non-waste water)

Constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created it). This listing does not include waste codes which are not yet restricted from land disposal.

Treatment standards do not preclude reclamation prior to final disposition.

Generator Company: Perfect Plating

EPA ID NO.: MOD985799238

Generator's Signature:

X *Scott W. Smith*

Date: 02/23/93



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT PROGRAM

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

SEND TO MISSOURI DEPARTMENT OF NATURAL RESOURCES, WASTE MANAGEMENT PROGRAM
P.O. BOX 176, JEFFERSON CITY, MO 65102

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA ID NUMBER

APPROVED

DATE RECEIVED
YR. MO. DAY

T/A C
1

NAME OF INSTALLATION

PERFECT PLATING COMPANY INC

INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX NUMBER

2000 HYDE DRIVE

CITY OR TOWN

MACON

STATE

ZIP CODE

MO

63552

LOCATION OF INSTALLATION

STREET AND NUMBER

2000 HYDE DRIVE

CITY OR TOWN

MACON

STATE

ZIP CODE

MO

63552

INSTALLATION CONTACT

NAME AND TITLE (LAST, FIRST, AND JOB TITLE)

TELEPHONE NUMBER

WARREN SCOTT PRESIDENT

816 385 3626

OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

B. TYPE OF OWNERSHIP (ENTER CODE)

PERFECT PLATING CO INC P

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN THE APPROPRIATE BOXES. REFER TO INSTRUCTIONS)

A. HAZARDOUS WASTE ACTIVITY

B. USED OIL FUEL ACTIVITIES

GENERATOR

☒ 1b. LESS THAN 1,000 KG./MO.

TRANSPORTER

TREATER/STORER/DISPOSER

4. UNDERGROUND INJECTION

5. MARKET OR BURN HAZARDOUS WASTE FUEL (enter 'X' & mark appropriate boxes below)

☐ A. GENERATOR MARKETING TO BURNER

☐ B. OTHER MARKETER

☐ C. BURNER

☐ 6. OFF-SPECIFICATION USED OIL FUEL

(enter 'X' & mark appropriate boxes below)

☐ a. GENERATOR MARKETING TO BURNER

☐ b. OTHER MARKETER

☐ c. BURNER

☐ 7. SPECIFICATION USED OIL FUEL MARKETER (OR ON-SITE BURNER)
WHO FIRST CLAIMS THE OIL MEETS THE SPECIFICATION

WASTE FUEL BURNING: TYPE OF COMBUSTION DEVICE

Enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used fuel is burned. See instructions for definitions of combustion devices)

A. UTILITY BOILER

☐ B. INDUSTRIAL BOILER

☐ C. INDUSTRIAL FURNACE

MODE OF TRANSPORTATION (TRANSPORTERS ONLY-ENTER 'X' IN THE APPROPRIATE BOX(ES))

A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (SPECIFY)

FIRST OR SUBSEQUENT NOTIFICATION

Enter 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is your first notification, enter your installation's EPA ID Number in the space provided below.

A. FIRST NOTIFICATION

☒ B. SUBSEQUENT NOTIFICATION (COMPLETE ITEM C)

C. INSTALLATION'S EPA I.D. NUMBER

MO D985799238

T/A	C
	1

Wastes from Nonspecific Sources (F-List). Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Below each number, enter monthly generation amount in pounds and frequency code A, B, or C.

F	0	0	6
---	---	---	---

300 lbs.	B
----------	---

lbs.

ibs.

the

lbs.

lbs.

ibs.

lbs

ibs.

ins

ibs

1hg

1. IGNITABLE
(D001)(D0018)(D0039)

60 lbs.

5

2. CORROSIVE
(D002)

lbs.

3. REACTIVE
(D003)

lbs

lbs.

lbs.

lbs.

lbs.

3	4	7	1
---	---	---	---

7

TWRE

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

DATE _____

0.7/25/92
~~0.7/10/92~~



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT PROGRAM
**FORM D.N.R. - H.W.G.- 5 GENERATOR OF
WASTE OIL REGISTRATION FORM**

P.O. BOX 176
JEFFERSON CITY, MISSOURI 65102

OFFICE USE ONLY

GENERATOR
I.D. NO.

INSTRUCTIONS ► PRINT IN BLACK INK OR TYPE

BUSINESS NAME
Perfect Plating Co. Inc.

MAILING ADDRESS
2000 Hyde Dr.

MACON, MO 63552-9782

ESTIMATED AMOUNT OF WASTE OIL GENERATED PER MONTH

5 gallons

NAME OF SITE WHERE WASTE OIL GENERATED

PLATING SHOP CAUSTIC CLEANERS & MAINTS. SHOP.

STREET ADDRESS BY NUMBER AND STREET

2000 Hyde Dr. MACON, MO 63552-9782

BUSINESS OWNER'S NAME

Perfect Plating Co. Inc.

PHONE NUMBER

816-385-3626

NAME AND MAILING ADDRESS OF TRANSPORTATION FIRMS TRANSPORTING WASTE OIL FROM YOUR PREMISES

Safety Kleen Corp.

2400 Big Bear Ct.

Columbia, MO 65202

NOT YET ANY SHIPMENTS AS OF THIS DATE.
AN ALTERNATE IS BEING SAUGHT

IF YOU ALREADY HAVE A MISSOURI GENERATOR IDENTIFICATION NUMBER FROM THE MISSOURI DEPARTMENT OF NATURAL RESOURCES, PLEASE RECORD IT HERE

014998

THE GENERATOR CERTIFIES THAT THE INFORMATION PROVIDED HEREIN IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Scott Warren 02/25/92

SCOTT WARREN

SIGNATURE OF GENERATOR OR EMPLOYEE AUTHORIZED BY GENERATOR

Scott Warren

DATE

02/25/92

PRINT OR TYPE NAME OF GENERATOR OR EMPLOYEE AUTHORIZED BY GENERATOR

Perfect Plating Co. Inc.